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Attorneys for Plaintiff JEANELLE COUCH

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

DAVID COUCH, Sr., and JEANELLE
COUCH; both individually and as
successors in interest to DAVID
COUCH, Jr. Decedent,

Plaintiffs,

vs.

STATE OF CALIFORNIA, by and
through CALIFORNIA HIGHWAY
PATROL; RYAN CATES; SHASTA
COUNTY; and DOES 1-210, inclusive,

Defendants.

Case No.: **2:24-cv-00481-TLN-AC**

[*Honorable Troy L. Nunley*]
Magistrate Judge Allison Claire

**PLAINTIFF JEANELLE COUCH'S
DECLARATION PURSUANT TO CODE
OF CIVIL PROCEDURE § 377.32**

Action Originally Filed: January 23, 2024

Action Removed: February 15, 2024

Jury Trial: Not Set

1 I, Jeanelle Couch, declare as follows:

2 1. I am over the age of 18 years. I have personal knowledge of the facts
3 contained in this declaration, and if called as a witness I could and would testify
4 competently to the truth of the facts stated herein.

5 2. I am the surviving mother of David Couch, Jr., who died on February 14,
6 2023, at Redding Mercy Medical Center at 2175 Rosaline Avenue, Redding, California
7 96001.

8 3. No proceeding is now pending in the State of California for administration
9 of the estate of David Couch, Jr.

10 4. David Couch, Sr. and I are the successors in interest to Decedent David
11 Couch, Jr., as defined in Section 377.11 of the Code of Civil Procedure, and succeed to
12 Decedent David Couch, Jr's interest in the above-entitled proceeding.

13 5. No other person has a superior right to commence the action or proceeding
14 or to be substituted for David Couch, Jr., in the pending action or proceeding.

15 6. A copy of the death certificate for David Couch, Jr. is attached hereto as
16 "Exhibit A" and incorporated herein by reference.

17 7. I declare under penalty of perjury under the laws of the State of California
18 that the foregoing is true and correct.

19 Dated: 5/8/2025

By: 

20 Jeanelle Couch